## IN THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

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IN RE:	T.R.A. DOCKET ROOM
PROMOTION TO INTRODUCE	) DOCKET NO. 03-00512
BELLSOUTH INTEGRATED	)
SOLUTIONS PROGRAMTARIFF	)
NUMBER 2003956	) COURT OF APPEALS NO. M2004-
	) 01485-R12-CV
	)

## CONSUMER ADVOCATE'S RESPONSE TO BELLSOUTH'S MOTION TO SUPPLEMENT RECORD ON APPEAL

Comes Paul G. Summers, the Attorney General for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of the Attorney General (hereinafter "Consumer Advocate"), and hereby responds to *BellSouth's Motion to Supplement Record on Appeal* filed by BellSouth Telecommunications, Inc. ("BellSouth") on November 22, 2004.

BellSouth has asked the Authority to supplement the record on appeal in Court of Appeals Case No. M2004-01485-R12-CV¹ by including BellSouth's *Brief Addressing Federal Resale Requirements in the Context of Combined Offerings* in the appellate record. The Consumer Advocate supports the BellSouth motion so long as the appellate record is also supplemented to include the Consumer Advocate's response to the BellSouth brief, *Consumer Advocate's Response to BellSouth's Brief Addressing Federal Resale Requirements in the Context of Combined Offerings*, filed December 30, 2003.

<sup>&</sup>lt;sup>1</sup>BellSouth inadvertently referenced the appeal of this decision as Case No M2004-01481-R12-CV

RESPECTFULLY SUBMITTED,

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Dated: November 23, 2004

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via facsimile on November 23, 2004, upon:

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